UNITED STATES DISTRICT COURT DISTRICT OF OREGON EUGENE DIVISION

UNITED STATES OF AMERICA,

Case No. 6:16-CR- 379 - AA

Plaintiff,

INFORMATION

vs.

Count 1: Wire Fraud 18 U.S.C. § 1343

Forfeiture Allegation

SHANNON JONES,

THE UNITED STATES ATTORNEY CHARGES:

INTRODUCTORY ALLEGATIONS

At all times relevant to this Information:

1. From in or about January 2012 to in or about November 2015, in the District of Oregon, defendant **SHANNON JONES** devised and intended to devise a scheme to defraud the clients, lenders, and associates of Jones 5 Auto, to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises. As a result of defendant's scheme, he fraudulently obtained over \$800,000 in loan proceeds and approximately \$500,000 in vehicle sales proceeds.

2. Defendant **SHANNON JONES** carried out his scheme to defraud under materially false pretenses, including: accepting payments for vehicles with no intention of delivering the vehicles; obtaining loans for vehicles for which he falsely claimed to hold title; taking vehicles on consignment and selling them without providing the proceeds to the original owner; and falsely representing to associates and lenders the financial health of his business, the existence of collateral, and the intended use of short-term loan proceeds.

COUNT 1 (Wire Fraud)

- 3. Paragraphs One and Two of the Introductory Allegations are incorporated herein.
- 4. On or about November 18, 2015, in the District of Oregon, defendant SHANNON JONES, for the purposes of executing the scheme described above, and attempting to do so, caused to be transmitted by means of a wire in interstate commerce, a bank wire from New Mexico to Oregon in the amount of \$23,450. To obtain this money, defendant instructed a customer to send the wire for the purchase of a van under materially false pretenses where, unbeknownst to the customer, defendant was texting other individuals to say that he could not pay them back and that he had lied. The customer neither received the van nor a refund of his money.

In violation of Title 18, United States Code, Section 1343.

FORFEITURE ALLEGATION (18 U.S.C. § 981(a)(l)(C) and 28 U.S.C. § 2461(c))

5. The allegations contained in Count One of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

6. Upon conviction of the offenses in violation of Title 18, United States Code, Section 1343 set forth in Count One of this Information, the defendant, **SHANNON JONES**, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses alleged in Count One.

7. If any of the property described above, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

Dated this 13th day of September 2016.

BILLY J. WILLIAMS United States Attorney

NANCY M. OLSON

Assistant United States Attorney